

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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In re: : Chapter 9
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CITY OF DETROIT, MICHIGAN, : Case No.: 13-53846
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Debtor. : Hon. Steven W. Rhodes
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**AMENDED NOTICE OF DEPOSITION OF INTERNATIONAL UNION, UAW TO
GENERAL RETIREMENT SYSTEM OF THE CITY OF DETROIT**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 7030 and Federal Rule of Civil Procedure 30(b)(6), the International Union, UAW (“UAW”) will take the deposition upon oral examination of the General Retirement System of the City of Detroit (“GRS”) at the Detroit offices of Clark Hill PLC, 500 Woodward Avenue, Suite 3500, Detroit, Michigan 48226, on July 15, 2014 beginning at 10:00 am.

The matters for examination will include:

1. the status of the Detroit Library Commission (“DLC”) as an entity separate from the City of Detroit (“City”);
2. the number of GRS participants since 2009 and currently who are or were active DLC employees, deferred vested former DLC employees and retired DLC employees;
3. contributions made each year since 2009 to the GRS on behalf of GRS participants who are or were active, deferred vested or retired DLC employees, including which persons or entities made such contributions and the amounts of such contributions made by each person or entity;

4. the amount of GRS's accrued liabilities attributable or allocable to GRS participants who are or were active, deferred vested or retired DLC employees and the funding status of such liabilities;
5. any discussions, communications, agreements, conclusions, resolutions or understandings among or between the GRS, the DLC, the City, the City's Emergency Manager and/or the State of Michigan ("State") (including the State's agencies and/or its officers) and/or the counsel, employees or agents of the aforementioned entities (including City counsel Jones Day), regarding the actual or potential impact or effect of the above-captioned Chapter 9 proceeding on the pensions or other post-employment benefits ("OPEB") of active, deferred vested or retired DLC employees or upon the obligations or liabilities of the DLC, the City or the State concerning such pensions or OPEB;
6. any alleged contingent liability that the City may have for contributions, payments, pension benefits or OPEB of active, deferred vested or retired DLC employees.

The GRS has designated its Executive Director Cynthia A. Thomas to testify regarding subjects #1-#4 and #6 above and its General Counsel Michael J. VanOverbeke to testify regarding subject #5. The deposition will begin with the testimony of Ms. Thomas, to be followed by the testimony of Mr. VanOverbeke.

Dated: New York, New York
July 2, 2014

International Union, UAW

By: /s/ Peter D. DeChiara
Cohen, Weiss and Simon LLP
Babette A. Ceccotti
Peter D. DeChiara
330 West 42nd Street
New York, New York 10036-6976
T: 212-563-4100
F: 212-695-5436
bceccotti@cwsny.com
pdechiara@cwsny.com

Niraj R. Ganatra (P63150)
8000 East Jefferson Avenue
Detroit, Michigan 48214
T: (313) 926-5216
F: (313) 926-5240
nganatra@uaw.net

Attorneys for International Union, UAW

CERTIFICATE OF SERVICE

I certify that on this 2nd day of July 2014, I caused the foregoing document to be served on counsel for the GRS and for all other parties of record through the Court's CM/ECF system.

/s/ *Peter D. DeChiara*
Peter D. DeChiara